



County of Los Angeles **CONTRACTOR HEARING BOARD**

713 KENNETH HAHN HALL OF ADMINISTRATION • LOS ANGELES, CALIFORNIA 90012

July 8, 2008

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

**DEBARMENT OF ARROWHEAD EMANCIPATION PROGRAM, INC.
AND IRMA F. REED AND CHARLENE WILLIAMS
(ALL DISTRICTS AFFECTED) (3 VOTES)**

SUBJECT

The Contractor Hearing Board (CHB) was established to provide an independent review to a contracting department's recommendation to debar a contractor. This letter requests Board approval to adopt the proposed findings, decision, and recommendations of the CHB to permanently debar Arrowhead Emancipation Program, Inc., and its principals, Irma F. Reed and Charlene Williams from bidding on, being awarded, and/or performing work on any contracts for the County of Los Angeles from the date of your Board's approval as a consequence of what the CHB found to be serious contract violations and unethical practices.

IT IS RECOMMENDED THAT YOUR BOARD:

1. Adopt the proposed findings, decision, and recommendations of the Contractor Hearing Board to permanently debar Arrowhead Emancipation Program, Inc., and its principals, Irma F. Reed and Charlene Williams from bidding on, being awarded, and/or performing work on any contracts for the County of Los Angeles from the date of your Board's approval.
2. Instruct the Executive Officer to send notice to Arrowhead Emancipation Program, Inc., and its principals, Irma F. Reed and Charlene Williams advising of the debarment action taken by your Board.
3. Instruct the Interim Director of Internal Services to enter this determination to permanently debar Arrowhead Emancipation Program, Inc., and its principals, Irma F. Reed and Charlene Williams into the Contract Database.

"To Enrich Lives Through Effective And Caring Service"

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Intra-County Correspondence Sent Electronically Only**

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The purpose of the recommended debarment action against the contractor, Arrowhead Emancipation Program, Inc. (Arrowhead), and its principals, Irma F. Reed (Reed) and Charlene Williams (Williams), is to ensure the County of Los Angeles (County) contracts only with responsible contractors who comply with the terms and conditions of their County contracts, and with any relevant Federal, State, and local laws.

Implementation of Strategic Plan Goals

The recommended actions are consistent with the County's Vision which supports shared values of integrity, professionalism, and accountability, and envisions the County as the premier organization for those working in the public's interest with a pledge to always work to earn the public trust.

FISCAL IMPACT/FINANCING

Not applicable.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The Contractor Non-Responsibility and Debarment Ordinance

The Contractor Non-Responsibility and Debarment Ordinance, County Code Chapter 2.202, provides the County with the authority to terminate contracts and debar contractors when the County finds, in its discretion, that the contractor has done any of the following:

- Violated a term of a contract with the County or a non-profit corporation created by the County;
- Committed an act or omission which negatively reflects on the contractor's quality, fitness, or capacity to perform a contract with the County, any other public entity, or a non-profit corporation created by the County, or engaged in a pattern or practice which negatively reflects on the same;
- Committed an act or omission which indicates a lack of business integrity or business honesty; or
- Made or submitted a false claim against the County or any other public entity.

In considering debarment, the County may consider the seriousness and extent of the contractor's acts, omissions, patterns, or practices and any relevant mitigating factors.

Contractor Hearing Board Responsibilities

County Code Chapter 2.202, the Contractor Non-Responsibility and Debarment Ordinance, established the CHB to provide an independent review of the contracting department's recommendation to debar a contractor. The CHB is chaired by a representative from the Chief Executive Office (CEO) and includes one representative from the Office of Affirmative Action Compliance (OAAC) and the Departments of Internal Services (ISD) and Public Works (DPW), respectively. In addition, the CHB includes the departments of Health Services, Parks and Recreation and Public Social Services as alternate member departments. The CEO is a nonvoting member except in the event the debarment action is initiated by the OAAC, ISD, or DPW. In such instances, the CEO exercises its vote and the CHB member from the department bringing the debarment action, must reclude himself/herself from any participation in the hearing. In this particular debarment hearing, there was no potential for conflict of interest as the department bringing the debarment action was a non-CHB member department. Therefore, the CEO representative did not vote in this debarment hearing, but participated in the hearing and deliberations.

In February 2008, the Department of Children and Family Services (DCFS), with the support of the Auditor-Controller and the Probation Department, requested the CEO to convene the CHB to initiate debarment proceedings against Arrowhead, and its principals, Reed and Williams, for:

- Violation of the terms of its 2004 group home foster care services contract with DCFS by engaging in, among other violations as explained below, self dealing real estate transactions;
- Commission of an act or omission which negatively reflects on the contractor's quality, fitness, or capacity to perform a contract with the County, or engagement in a pattern or practice which negatively reflects on same;
- Commission of an act or offense which indicated a lack of business integrity or business honesty; and
- Submission of false claims against the County.

On March 12, 2008, DCFS sent proper notice via certified first class letters and facsimiles to Arrowhead, Reed and Williams notifying them of the Department's intent to initiate debarment proceedings against Arrowhead, and its principals, Reed and Williams, with a recommendation of permanent debarment, at a hearing scheduled for April 23, 2008 at 1:30 p.m., in the Kenneth Hahn Hall of Administration, Assessment Appeals Board Room B28, Room E (Attachment I). Included in this correspondence was notice to the parties that they must confirm by written notice to DCFS their intent to attend the debarment hearing and oppose the debarment recommendation by March 28, 2008. The recommendation of debarment was timely because Arrowhead had a contractual relationship with the County of Los Angeles which expired on October 31, 2005 (within three years of the recommended debarment).

On March 31, 2008, DCFS sent a letter to Arrowhead, Reed and Williams notifying them that DCFS had not received any indication, written or otherwise, that Reed, Williams or any representative for Arrowhead, intended to appear at the April 23, 2008 debarment hearing to oppose the recommendation of debarment (Attachment II). As such, their failure to respond was construed as a waiver by Arrowhead, Reed, and Williams of their right to contest the debarment recommendation. DCFS thus proceeded in their absence and placed an uncontested debarment recommendation before the CHB at the hearing on April 23, 2008. At that hearing, the CHB voted to recommend permanent contractor debarment of Arrowhead, Reed and Williams.

The proceeding was digitally recorded and recording is available upon request, as well as all the documents entered into the record as exhibits during the hearing.

- Attachment III is a listing of the exhibits that were entered into the record.
- Attachment IV is a listing of CHB members, departmental representatives, County Counsel for DCFS and witnesses.

SUMMARY OF EVIDENCE AND ARGUMENT

On behalf of DCFS, its County Counsel representative submitted correspondence and supporting documentation that alleged, among other things, Arrowhead, and Reed deliberately created false documents in order to mislead others and thereby have committed acts which indicate a lack of business honesty; furthermore, Reed and Williams claimed ignorance of unpaid taxes which the Internal Revenue Service (IRS) sought to levy and which their group home documents memorialize. DCFS presented witness testimony and written documentation to show the following:

Arrowhead and Reed Had Deliberately Created False Documents in Order to Mislead Others and Thereby Have Committed Acts Which Indicated a Shocking Lack of Business Honesty; Furthermore, Reed and Williams Had Claimed Ignorance of Unpaid Taxes Which the IRS Sought to Levy and Which Their Group Home Documents Memorialize.

The evidence presented showed that Arrowhead, by and through its agent, Reed, falsely claimed that Clifford Johnson was an employee of the organization. Arrowhead went so far as to generate an inaccurate document in order that Mr. Johnson might use that inaccurate document to misrepresent his employment status and income thereby qualifying for a loan to purchase real property – a loan for which he would not otherwise have qualified. These allegations are effectively beyond dispute because Reed admitted the deception during her interview with members of the Auditor-Controller's Office of County Investigations.

Among the documents obtained by the Auditor-Controller as part of their investigation was a Internal Revenue Service Form W-2, Wage and Earnings Statement for the year 1996. That W-2 Form listed Clifford Johnson as an employee of Arrowhead earning wages, tips and other compensation in the amount of one hundred forty-seven thousand five hundred forty-one dollars

and forty-five cents (\$147,541.45). The W-2 Form was found to be false and it was determined that Mr. Johnson was never an employee of Arrowhead, he never drew a salary, much less did he earn a six-figure income from the group home.

In addition to the falsified W-2 Form, the Auditor-Controller also obtained a copy of a June 27, 1998 letter written on the group home's letterhead and addressed "to whom it may concern." The body of the letter consisted of just two completely inaccurate sentences which read: "Clifford Johnson is employed at our company as the Sr. Administrator. He has been with us since September of 1982 and has no ownership in this organization." Given Reed's admissions, the statements in that letter are also false. The Auditor-Controller also uncovered an earnings statement which was also falsified. By her own admission, made to members of the Auditor-Controller's Office of County Investigations, Reed also acknowledged having previously used a false social security number to transact business. That admission illustrated a lack of business honesty and showed that Reed's deceptive practices were neither new nor isolated.

There is also evidence that Williams has engaged in acts of business dishonesty. When Diana Flagg, Contract Analyst for DCFS, asked Williams about the IRS's claim that Arrowhead had failed to pay its payroll taxes, Williams and Reed both claimed ignorance. Nevertheless, audited financial statements from Fiscal Year 2002 and Fiscal Year 2003 as well as the corporate governance structure and IRS documents make it clear that Williams must have known about the tax issues.

Arrowhead Violated The Terms of its Contract with the County of Los Angeles.

Among the laws which apply to the operation of a group home are laws pertaining to self-dealing transactions. In fact, the Community Care Licensing Division of the California Department of Social Services (CDSS) issues a booklet to group home operators alerting them to legal issues relevant to their operation and also requires that the group home operators sign documents indicating that they have received, read and understood the booklet. Among other things, the booklet alerts group home operators to conflicts of interest issues and self-dealing transactions. Arrowhead's lease of the property located at 433 W. Altadena Drive, Altadena, California, was a conflicted and self-dealing transaction. The landlord was Reed, and she also signed on behalf of the group home. Other self-dealing transactions existed, but were less obvious due to efforts by Reed and Arrowhead to conceal the nature of the transactions. Nevertheless, several landlords allowed Reed to actually control the properties they purported to own. These self dealing leases were legally impermissible.

California Welfare and Institutions Code section 11462.06 states that "Commencing July 1, 2003, any group home providers with a self-dealing lease transaction for shelter costs, as defined in Section 5233 of the Corporations Code, shall not be eligible for an AFDC-FC rate." There was however, a narrow exception to that prohibition. The same statute states that "providers that receive an approval letter for a self dealing lease transaction for shelter costs during the Fiscal Year 2002-2003 from the Charitable Trust Section of the Department of Justice shall be eligible to continue to receive an AFDC-FC rate until the date the lease expires, or is

modified, extended, terminated, whichever occurs first. These providers shall be ineligible to receive an AFDC-FC rate after that date if they have entered into any self-dealing lease transactions for group home shelter costs."

Arrowhead did not receive an approval letter for a self-dealing lease transaction for shelter costs during Fiscal Year 2002-2003 from the Charitable Trust Section of the Department of Justice; consequently, Arrowhead was not eligible to receive its AFDC-FC rate after July 1, 2003. Therefore, as of November 1, 2004, when Arrowhead signed its contract with the County, it was not qualified to receive an AFDC-FC rate. That was a violation of the above-referenced laws, and also of the contract. It must also be noted that Williams also signed one of these facially self-dealing leases.

Section 19.0 of the November 1, 2004, contract between the County and Arrowhead, required Arrowhead to meet various insurance coverage requirements. In a letter dated May 6, 2005, Linda Reusser, DCFS, Out of Home Care Management Division, wrote to Reed and noted that Arrowhead lacked the required Worker's Compensation and Employer's Liability insurance and consequently was in breach of its contract. Ms. Reusser's letter memorialized the fact that Reed had admitted that Arrowhead had lacked the insurance since 2003, and that County records suggested it had lapsed even earlier – June 10, 2002. The County did not waive the breach of those contract provisions; rather Arrowhead was placed on an "Administrative Hold" as described in Ms. Reusser's letter. Arrowhead was given until May 16, 2005 to obtain the required insurance.

The contract also required compliance with the *Auditor-Controller Contract Accounting and Administration Handbook*. The handbook stated, among other things, in a section captioned "Cash Disbursements Journal," that "Checks should not be written to employees (other than payroll, mileage, travel, and petty cash custodian checks)." The documents obtained from Arrowhead reveal checks written by the organization to Reed, its executive director, and signed by Reed on behalf of the organization. The issuance of these checks to Reed is a violation of the terms of the contract. There are no second signatures on these checks, and that too is a contract violation. As yet another example of impropriety, the memo portion of check 9023 indicates it is a rent payment, and that is an improper payment to make to an employee.

Under the terms of its contract, Arrowhead was required to abide by all applicable laws. The tax laws are among the laws which applied to Arrowhead Emancipation Program, Inc. As evidenced by the IRS levy documents sent to the County, Arrowhead did not pay all of its employee payroll taxes. Financial statements obtained from Arrowhead indicate that the non-payment of taxes was an ongoing issue referenced in several audited financial statements. That was another violation of the law and the contract.

Arrowhead Made or Submitted a False Claim Against the County.

Under the terms of its November 2004 contract for group home foster care services, the County paid Arrowhead "for each Placed Child the monthly group home rate(s) established by the California Department of Social Services, Foster Care Funding and Rates Bureau." AFDC-FC

money was used to pay Arrowhead; however, Arrowhead's self-dealing leases rendered it legally ineligible to receive AFDC-FC funds. Because Arrowhead was not entitled to receive AFDC-FC payments due to its unauthorized self-dealing leases, the invoices it submitted to the County constituted false claims.

Arrowhead Committed an Act Which Negatively Reflects on the Contractor's Quality, Fitness, and Capacity to Perform a Contract with the County.

As noted above, Reed, Williams and Arrowhead have violated the law; violated the terms of their contract; misrepresented what they knew about corporate misdeeds; and, in the case of Reed, generated false documents in order to facilitate deceptive real estate transactions by straw purchasers. This makes them unfit to perform a County contract.

The County only does business with "responsible contractors" (County Code section 2.202.010). The purpose of that ordinance is to promote integrity in the County contracting process. A nonresponsible contractor is one which has displayed a lack of business ethics and business integrity as demonstrated by Arrowhead, and its principals, Reed and Williams.

Arrowhead is a group home which provides foster care services to children. The funds used to pay for such contracts include Federal Title IV-E and Title IV-B funds. The Federal regulations which attach to those funds require that contractors be responsible. The above-referenced Federal funds pass initially to the State of California and are administered by CDSS. Funds administered by CDSS are governed by Chapter 23-000 of the CDSS' Manual of Policies and Procedures, and that body of regulations also includes the requirement that only responsible contractors be used. One cannot be a responsible contractor under those State and federal regulations if one has poor business ethics. It is clear that Arrowhead, Reed, and Williams have demonstrated poor business ethics. Consequently, they cannot receive a contract funded with CDSS-administered funds.

FINDINGS AND RECOMMENDED DECISION

After considering the evidence and arguments presented by the parties, the CHB found that:

- Reed and Williams were principals at Arrowhead.
- The department had proven Arrowhead and Reed deliberately created false documents in order to mislead others and committed acts which indicate a lack of business honesty; furthermore, Reed and Williams claimed ignorance of unpaid taxes which the IRS has sought to levy and which their group homes documents memorialize which clearly demonstrated a continued commitment to engaging in dishonest business practices.
- Arrowhead violated the terms of its contract with the County by engaging in self dealing lease transactions; inappropriately receiving AFDC-FC rate payments; failing to acquire the required Workers' Compensation and Employer's Liability insurance; and improperly issuing checks to Reed.

- Arrowhead made or submitted a false claim against the County as it was not entitled to receive AFDC-FC rate payments due to its unauthorized self-dealing leases which constituted false claims against the County.
- Arrowhead, Reed, and Williams committed acts which negatively reflected on their quality, fitness, and capacity to perform a contract with the County by violating the law; violating the terms of their contract; misrepresenting what they knew about corporate misdeeds; and, in the case of Reed, generating false documents in order to facilitate deceptive real estate transactions by straw purchasers.
- As noted by one member of the CHB, based on the evidence presented and the testimony, these were very serious allegations against a contractor charged with providing vital services to vulnerable children and it seemed the contractor had shown little concern for welfare of the children as it continued to engage in illegal activity. Also, the CHB member indicated the contractor had committed acts which negatively affected on its ability to perform a contract with the County by creating false documents, not following applicable laws, and their failure to pay employee payroll taxes. The CHB member also stated that he was very impressed by the testimony provided by the witnesses from the Auditor-Controller's Office of County Investigations and DCFS.

The CHB member also stated that he was convinced that Arrowhead and its principles had put the County at severe financial risk with their actions by failing to abide by the terms of the contract. In addition, this CHB member noted there were few actions more reprehensible than the contractors' fraudulent activities while charged with the health and welfare of foster youth.

- Another member of the CHB pointed out that the submission of the fraudulent W-2 document to the IRS was an intentional act by Arrowhead and this action reflected a substantial lack of business integrity. The CHB member also noted that the contractor committed fraudulent and egregious acts by accepting AFDC-FC rate payments when they were not eligible for this rate of compensation and by indicating to the State they were not involved in self dealing lease transactions.
- Another member indicated it was "standard business practice for Arrowhead to engage in questionable business practices and this was unacceptable behavior for a County contractor."
- Another member of the CHB found the multiple, egregious acts, including the fraudulent check writing activities, committed by the contractors showed a pattern of dishonest and corrupt behavior. This member concluded this behavior violated the terms of the contract with the County.

The CHB members conclusively agreed the following aggravating factors assisted them in reaching their recommendations for debarment of Arrowhead, and its principals Reed and Williams for a permanent debarment period:

- *The actual or potential harm or impact that results or may result from the wrongdoing.* The CHB determined the contractors' illegal activities placed the County at significant financial risk as these activities could have resulted in the County being forced to pay back the fraudulent compensation that resulted from the AFDC-FC rate payments to the contractors.
- *The frequency of incidents and/or duration of the wrongdoing.* The CHB found that there were a number of fraudulent activities in which the contractors failed to live up to the contract requirements.
- *Whether there is a pattern of prior history of wrongdoing.* As noted above, the CHB found that there were a number of fraudulent activities in which the contractors failed to live up to the contract requirements.
- *Contractor's overall performance record.* As to the contractors' fiscal activities, the CHB found the contractor was a not responsible contractor and it did not meet its contractual obligations with the County.
- *Whether a contractor's wrongdoing was intentional or inadvertent.* The CHB found that contractors were aware their activities were illegal and did not seem concerned with the consequences of their actions.
- *Whether a contractor has accepted responsibility for the wrongdoing, recognizes the seriousness of the misconduct that led to the cause for debarment, and has taken corrective action to cure the wrongdoing, including taking appropriate disciplinary actions against those responsible.* The CHB found there was no evidence presented to suggest the contractors had accepted any responsibility for their actions.
- *Whether and to what extent a contractor has paid or agreed to pay criminal, civil, and administrative liabilities for the improper activity, and to what extent, if any, has the contractor made or agreed to make restitution.* The CHB found there was no evidence presented to indicate that the contractor had paid or agreed to pay criminal, civil, and administrative liabilities for the improper activity or that the contractors have made or agreed to make restitution to suggest that they had accepted any responsibility for their actions.
- *Whether a contractor has cooperated fully with the involved public entities during the investigation and any court or administrative action.* The CHB found that the contractor had cooperated with the County to a certain extent by submitting to interviews with DCFS and the Auditor-Controller's Office of County Investigations. However, the CHB

found the contractors' responses were inadequate and the contractors ceased to cooperate as the investigations progressed.

- *Whether the wrongdoing was pervasive with a contractor's organization.* The CHB found the ongoing fraudulent activities conducted by the contractors was a "way of doing business" with the organization.
- *The positions held by the individuals involved in the wrongdoing.* The CHB found that Reed and Williams were the Executive Director and Program Manager, respectively, of Arrowhead, and they both had engaged in fraudulent activities.
- *Whether a contractor's principals participated in, knew of, or tolerated the offense.* As stated above, the CHB found that Reed and Williams were the Executive Director and Program Manager, respectively, of Arrowhead, and they both had engaged in fraudulent activities.
- *Whether a contractor brought the activity cited as a basis for debarment to the attention of the County in a timely manner.* The CHB found the contractors made no attempts to bring the activity cited as a basis for debarment to the attention of the County in a timely manner.
- *Whether the contractor has fully investigated the circumstances surrounding the case for a debarment finding and if so, made the results of the investigation available to the County.* The CHB found the contractors did not investigate the allegations and, notably, did not present any evidence to refute the charges.

Therefore, by unanimous vote, the CHB decided to recommend to your Board that Arrowhead, and its principals, Reed and Williams, be debarred; by another unanimous vote, the CHB recommended permanent debarment. In making these recommendations, the CHB considered the repeated and blatant violations of the terms of the contract committed by Arrowhead, and its principals, Reed and Williams, the multiple acts which negatively reflected on the contractor's quality, fitness, or capacity to perform a contract with the County and which indicated a lack of business integrity or business honesty, and the submission of false claims against the County.

IMPACT ON CURRENT PROJECTS

Not applicable.

CONCLUSION

The Contractor Non-Responsibility and Debarment process is working as your Board intended to help assure that the County contracts only with responsible contractors who comply with all relevant laws, as well as the terms and conditions of their contracts. The process has also identified potential areas for County contracting program improvements to promote a better understanding of contracting requirements.

Respectfully submitted,



MARTIN K. ZIMMERMAN
Assistant Chief Executive Officer
Chair, Contractor Hearing Board

MKZ:VLA:pg

Attachments (4)

- c: William T Fujioka, Chief Executive Officer
Dean D. Efsthathiou, Acting Director, Public Works
Dennis A. Tafoya, Affirmative Action Compliance Officer
Raymond G. Fortner, Jr., County Counsel
Tom Tindall, Interim Director of Internal Services
Irma F. Reed, Principal, Arrowhead Emancipation Program, Inc.
Charlene Williams, Principal, Arrowhead Emancipation Program, Inc.
Patricia S. Ploehn, L.C.S.W. Director, Department of Children and Family Services
Robert B. Taylor, Chief Probation Officer
Wendy L. Watanabe, Acting Auditor-Controller



**County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PATRICIA S. PLOEHN, LCSW
Director

BY CERTIFIED FIRST CLASS MAIL
AND BY FACSIMILE TO: (626) 798-7004

March 12, 2008

Ms. Charlene Williams
Arrowhead Emancipation Program, Inc.
484 E. Sacramento Street
Altadena, CA 91001

Ms. Charlene Williams
Arrowhead Emancipation Program, Inc.
P.O. Box 93965
Pasadena, CA 91109

Board of Supervisors
GLORIA MOLINA
First District
YVONNE B. BURKE
Second District
ZEV YAROSLAVSKY
Third District
DON KNABE
Fourth District
MICHAEL D. ANTONOVICH
Fifth District

RE: DEBARMENT PROCEEDINGS

Dear Ms. Williams:

The County of Los Angeles Department of Children and Family Services intends to recommend that Arrowhead Emancipation Program, Inc., and its principals, including but not necessarily limited to Irma F. Reed and Charlene Williams, be debarred. The recommended debarment will be made pursuant to Los Angeles County Code chapter 2.202. The Los Angeles County Code is available online at the County website www.lacounty.info. Among other things, this notice specifies the basis for the proposed debarment recommendation, the proposed duration of the period of debarment and also includes a summary of evidence to support the recommendation. Those details are set forth in Attachment A, which is incorporated herein by reference.

The date, time and place of the debarment hearing are as follows:

DATE: Wednesday, April 23, 2008
TIME: 1:30 p.m.
PLACE: Kenneth Hahn Hall of Administration
500 West Temple Street, Room B28-E
Los Angeles, CA 90012

During the above-identified hearing, the Contractor Hearing Board will consider the department's recommendation that Arrowhead Emancipation Program, et al., be debarred. After the debarment hearing concludes, the Contractor Hearing Board will prepare a proposed decision. That decision will contain a recommendation to the County of Los Angeles Board of Supervisors as to whether or not Arrowhead Emancipation Program, Inc., and/or any of its principals, should be debarred and, if so,

the appropriate length of time for debarment. The Board of Supervisors may, in its discretion, limit any further hearing to the presentation of evidence not previously presented. The Board of Supervisors has the right to modify, deny, or adopt the Contractor Hearing Board's proposed decision and recommendation. Any debarment finding shall become final upon approval of the Board of Supervisors.

At the Contractor Hearing Board hearing, a party to be debarred is entitled to appear and/or be represented by an attorney or other authorized representative. A party to be debarred is also entitled to present evidence against a finding of debarment, and during the hearing it or its representative may offer documentary evidence, present witnesses, and offer rebuttal evidence as authorized by the Los Angeles County Code. Alternatively, the department and the party to be debarred may agree to submit the matter to the Contractor Hearing Board on the basis of documentary evidence only.

Arrowhead Emancipation Program, Inc., et al., must confirm with the department that it and/or its representative intend to attend the April 23, 2008, Contractor Hearing Board hearing. A written confirmation of intent to attend the April 23, 2008, debarment hearing and oppose the debarment recommendation must be received by Diana Flaggs, of the Department of Children and Family Services, no later than 5:00 p.m. Pacific Daylight Saving Time, Friday, March 28, 2008. Failure to provide the department with written confirmation of intent to attend the hearing and oppose the debarment recommendation by the deadline set forth above may result in waiver of all rights to a hearing before the Contractor Hearing Board. Ms. Flaggs' mailing address is:

Diana Flaggs
Department of Children and Family Services
425 Shatto Place, Room 400
Los Angeles, CA 90020

If Arrowhead Emancipation Program, Inc., et al., intend to oppose the debarment recommendation, the department will provide a list of prospective witnesses and copies of all documentary evidence at least five (5) days prior to the scheduled hearing. If Arrowhead Emancipation Program, Inc., et al., intend to present evidence against the proposed debarment, it must provide a list of all prospective witnesses and copies of any documentary evidence to the department at least five (5) days prior to the hearing. At the same time, the Contractor Hearing Board must also be provided with five (5) copies of each item so exchanged.

Those items must be received by Ms. Flaggs, of the Department of Children and Family Services, and Mr. Vincent Amerson, of the Chief Executive Office, no later than 5:00 p.m., April 18, 2008. Mr. Amerson's mailing address is:

Vincent Amerson
Chief Executive Office, Room 750
500 West Temple Street
Los Angeles, CA 90012

If you have any questions, please have your attorney contact Thomas Fagan, Senior Deputy County Counsel, at (213) 974-1919. If you do not have an attorney, you or your authorized representative may contact Mr. Fagan directly.

Very truly yours,



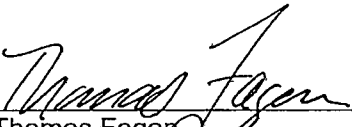
Patricia S. Ploehn, LCSW
Director

PSP

c: Vincent Amerson, Chief Executive Office, Contractor Hearing Board
Diana Flaggs, Department of Children and Family Services
Walter Chan, Department of Children and Family Services
Robert Campbell, Office of the Auditor-Controller
Thomas Fagan, Office of the County Counsel

Attachment

Approved as to form:


Thomas Fagan
Senior Deputy County Counsel
Office of the County Counsel

**ATTACHMENT A: Basis For Proposed Debarment Recommendation And
Summary Of Evidence To Support The Recommendation.**

The basis for the proposed debarment recommendation is that Arrowhead Emancipation Program, Inc., by and through its principals, (1) committed an act or omission which indicates a lack of business integrity or honesty; (2) committed an act or omission which negatively reflects on the contractor's quality, fitness, or capacity to perform a contract with the county, any other public entity, or a nonprofit corporation created by the county, or engaged in a pattern or practice which negatively reflects on same; (3) violated a term of a contract with the county or a nonprofit corporation created by the county, and (4) made or submitted a false claim against the county or any other public entity.

The Department of Children and Family Services will recommend debarment for the following periods of time:

Arrowhead Emancipation Program, Inc. – Permanent debarment

Irma F. Reed – Permanent debarment

Charlene Williams – Permanent debarment

A brief summary of the evidence to support the debarment recommendation is set forth below:

1. Arrowhead Emancipation Program, Inc., by and through Executive Director Irma F. Reed, created a W-2 Form which falsely listed a Mr. Clifford Johnson as an employee earning an annual salary, in 1996, of one hundred forty-seven thousand five hundred forty-one dollars and forty-five cents (\$147,541.45). In fact, Clifford Johnson was never an employee of Arrowhead Emancipation Program, Inc., nor did he draw a salary. Furthermore, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, Irma F. Reed admitted that Mr. Johnson was not an employee of Arrowhead Emancipation Program, Inc., he did not draw a salary from the organization, the W-2 Form was inaccurate and it was created in order to allow Mr. Johnson to use the form to qualify for a loan with which to purchase real property that he would not otherwise have qualified to purchase.

The County is prepared to produce a copy of the W-2 Form as well as witnesses from the Department of the Auditor-Controller who will testify as to the admissions made by Irma F. Reed. The County is also prepared to produce a written transcript of the interview which further documents the admissions made by Irma F. Reed. Additionally, the County is prepared to play the relevant portion of the audio recording of Ms. Reed's interview.

If Arrowhead Emancipation Program, Inc., or any of its principals, intend to oppose the recommended debarment, the Department of Children and Family Services asks that Ms. Irma F. Reed be present during the hearing and made available in order that she might be questioned by representatives of the County regarding her admissions, her actions and the actions of Arrowhead Emancipation Program, Inc., and its principals.

2. Irma F. Reed, the Executive Director of Arrowhead Emancipation Program, Inc., admitted, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, that she had used a false social security number to transact business in the past.

The County is prepared to produce witnesses from the Department of the Auditor-Controller who will testify as to the admission made by Irma F. Reed. The County is also prepared to produce a written transcript of the interview which documents the admission made by Ms. Reed. The County is also prepared to play the relevant portion of the audio recording of Ms. Reed's interview.

3. Arrowhead Emancipation Program, Inc., violated numerous terms of its November 1, 2004, Group Home Foster Care Services contract with the County of Los Angeles including, but not necessarily limited to, the following: (i) failure to comply with applicable laws, (ii) failure to abide by the requirements of the Auditor-Controller's Handbook and applicable Office of Management and Budget circular and (iii) absence of required insurance.

The County is prepared to produce documentary and testimonial evidence demonstrating the terms of the relevant County contract, the applicable laws, the absence of required insurance, the failure to pay legally required taxes, a pattern of fraudulent property transactions, a pattern of self-dealing lease transactions, a pattern of questionable loans, a pattern of unallowable interest rate payments on those loans and other unsupportable expenditures.

With regard to the request that Charlene Williams be debarred, the County will produce documentary and testimonial evidence that Ms. Williams signed an impermissible and facially self-dealing lease agreement on behalf of Arrowhead Emancipation Program, Inc., Furthermore, her position of responsibility within Arrowhead Emancipation Program, Inc., meant that she must either have been a party to the group home's improprieties or else derelict in her duties.

4. Insofar as Arrowhead Emancipation Program, Inc., was in violation of the applicable law, in violation of the terms of its contract and yet submitted vouchers for group home services to the County of Los Angeles' Department of Children and Family Services seeking AFDC-FC funds in payment for those services, Arrowhead Emancipation Program, Inc., by and through its principals, submitted false claims to a public entity.

The County is prepared to produce documentary and testimonial evidence demonstrating the terms of the relevant County contract, the requirements of the applicable laws and the improper claims for payment submitted to the County by Arrowhead Emancipation Program, Inc., by and through its principals.

5. With regard to the request that Charlene Williams be debarred, the County will produce documentary and testimonial evidence that Ms. Williams, at a minimum, signed an impermissible and facially self-dealing lease agreement on behalf of Arrowhead Emancipation Program, Inc. Furthermore, her position of responsibility within Arrowhead Emancipation Program, Inc., required that she participate in the group home's improprieties or else acquiesce in those improprieties. If Ms. Williams intends to oppose debarment, the County asks that she be present and available to be questioned by the County's representatives.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Charlene Williams
Arrowhead Emancipation Program, Inc.
484 E. Sacramento Street
Altadena, CA 91001

2. Article Number
(Transfer from service label)

7006 2150 0000 4218 3175

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Charlene Williams☐ Agent☐ Addressee

B. Received by (Printed Name)

Charlene Williams

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery

☐ Yes

Domestic Return Receipt

102595-02-M-1540

00503



County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PATRICIA S. PLOEHN, LCSW
Director

BY CERTIFIED FIRST CLASS MAIL
AND BY FACSIMILE TO: (626) 798-7004

March 12, 2008

Irma F. Reed, Executive Director
Arrowhead Emancipation Program, Inc.
484 E. Sacramento Street
Altadena, CA 91001

Irma F. Reed, Executive Director
Arrowhead Emancipation Program, Inc.
P.O. Box 93965
Pasadena, CA 91109

RE: DEBARMENT PROCEEDINGS

Dear Ms. Reed:

The County of Los Angeles Department of Children and Family Services intends to recommend that Arrowhead Emancipation Program, Inc., and its principals, including but not necessarily limited to, Irma F. Reed and Charlene Williams, be debarred. The recommended debarment will be made pursuant to Los Angeles County Code chapter 2.202. The Los Angeles County Code is available online at the County website www.lacounty.info. Among other things, this notice specifies the basis for the proposed debarment recommendation, the proposed duration of the period of debarment and also includes a summary of evidence to support the recommendation. Those details are set forth in Attachment A, which is incorporated herein by reference.

The date, time and place of the debarment hearing are as follows:

DATE: Wednesday, April 23, 2008
TIME: 1:30 p.m.
PLACE: Kenneth Hahn Hall of Administration
500 West Temple Street, Room B28-E
Los Angeles, CA 90012

During the above-identified hearing, the Contractor Hearing Board will consider the department's recommendation that Arrowhead Emancipation Program, et al., be debarred. After the debarment hearing concludes, the Contractor Hearing Board will prepare a proposed decision. That decision will contain a recommendation to the County of Los Angeles Board of Supervisors as to whether or not Arrowhead Emancipation Program, Inc., and/or any of its principals, should be debarred and, if so,

Board of Supervisors

GLORIA MOLINA
First District

YVONNE B. BURKE
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

the appropriate length of time for debarment. The Board of Supervisors may, in its discretion, limit any further hearing to the presentation of evidence not previously presented. The Board of Supervisors has the right to modify, deny, or adopt the Contractor Hearing Board's proposed decision and recommendation. Any debarment finding shall become final upon approval of the Board of Supervisors.

At the Contractor Hearing Board hearing, a party to be debarred is entitled to appear and/or be represented by an attorney or other authorized representative. A party to be debarred is also entitled to present evidence against a finding of debarment, and during the hearing it or its representative may offer documentary evidence, present witnesses, and offer rebuttal evidence as authorized by the Los Angeles County Code. Alternatively, the department and the party to be debarred may agree to submit the matter to the Contractor Hearing Board on the basis of documentary evidence only.

Arrowhead Emancipation Program, Inc., et al., must confirm with the department that it and/or its representative intend to attend the April 23, 2008, Contractor Hearing Board hearing. A written confirmation of intent to attend the April 23, 2008, debarment hearing and oppose the debarment recommendation must be received by Diana Flaggs, of the Department of Children and Family Services, no later than 5:00 p.m. Pacific Daylight Saving Time, Friday, March 28, 2008. Failure to provide the department with written confirmation of intent to attend the hearing and oppose the debarment recommendation by the deadline set forth above may result in waiver of all rights to a hearing before the Contractor Hearing Board. Ms. Flaggs' mailing address is:

Diana Flaggs
Department of Children and Family Services
425 Shatto Place, Room 400
Los Angeles, CA 90020

If Arrowhead Emancipation Program, Inc., et al., intend to oppose the debarment recommendation, the department will provide a list of prospective witnesses and copies of all documentary evidence at least five (5) days prior to the scheduled hearing. If Arrowhead Emancipation Program, Inc., et al., intend to present evidence against the proposed debarment, it must provide a list of all prospective witnesses and copies of any documentary evidence to the department at least five (5) days prior to the hearing. At the same time, the Contractor Hearing Board must also be provided with five (5) copies of each item so exchanged.

Those items must be received by Ms. Flaggs, of the Department of Children and Family Services, and Mr. Vincent Amerson, of the Chief Executive Office, no later than 5:00 p.m., April 18, 2008. Mr. Amerson's mailing address is:

Vincent Amerson
Chief Executive Office, Room 750
500 West Temple Street
Los Angeles, CA 90012

If you have any questions, please have your attorney contact Thomas Fagan, Senior Deputy County Counsel, at (213) 974-1919. If you do not have an attorney, you or your authorized representative may contact Mr. Fagan directly.

Very truly yours,



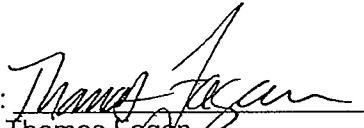
Patricia S. Ploehn, LCSW
Director

PSP

c: Vincent Amerson, Chief Executive Office, Contractor Hearing Board
Diana Flaggs, Department of Children and Family Services
Walter Chan, Department of Children and Family Services
Robert Campbell, Office of the Auditor-Controller
Thomas Fagan, Office of the County Counsel

Attachment

Approved as to form:


Thomas Fagan
Senior Deputy County Counsel
Office of the County Counsel

**ATTACHMENT A: Basis For Proposed Debarment Recommendation And
Summary Of Evidence To Support The Recommendation.**

The basis for the proposed debarment recommendation is that Arrowhead Emancipation Program, Inc., by and through its principals, (1) committed an act or omission which indicates a lack of business integrity or honesty; (2) committed an act or omission which negatively reflects on the contractor's quality, fitness, or capacity to perform a contract with the county, any other public entity, or a nonprofit corporation created by the county, or engaged in a pattern or practice which negatively reflects on same; (3) violated a term of a contract with the county or a nonprofit corporation created by the county, and (4) made or submitted a false claim against the county or any other public entity.

The Department of Children and Family Services will recommend debarment for the following periods of time:

Arrowhead Emancipation Program, Inc. – Permanent debarment

Irma F. Reed – Permanent debarment

Charlene Williams – Permanent debarment

A brief summary of the evidence to support the debarment recommendation is set forth below:

1. Arrowhead Emancipation Program, Inc., by and through Executive Director Irma F. Reed, created a W-2 Form which falsely listed a Mr. Clifford Johnson as an employee earning an annual salary, in 1996, of one hundred forty-seven thousand five hundred forty-one dollars and forty-five cents (\$147,541.45). In fact, Clifford Johnson was never an employee of Arrowhead Emancipation Program, Inc., nor did he draw a salary. Furthermore, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, Irma F. Reed admitted that Mr. Johnson was not an employee of Arrowhead Emancipation Program, Inc., he did not draw a salary from the organization, the W-2 Form was inaccurate and it was created in order to allow Mr. Johnson to use the form to qualify for a loan with which to purchase real property that he would not otherwise have qualified to purchase.

The County is prepared to produce a copy of the W-2 Form as well as witnesses from the Department of the Auditor-Controller who will testify as to the admissions made by Irma F. Reed. The County is also prepared to produce a written transcript of the interview which further documents the admissions made by Irma F. Reed. Additionally, the County is prepared to play the relevant portion of the audio recording of Ms. Reed's interview.

If Arrowhead Emancipation Program, Inc., or any of its principals, intend to oppose the recommended debarment, the Department of Children and Family Services asks that Ms. Irma F. Reed be present during the hearing and made available in order that she might be questioned by representatives of the County regarding her admissions, her actions and the actions of Arrowhead Emancipation Program, Inc., and its principals.

2. Irma F. Reed, the Executive Director of Arrowhead Emancipation Program, Inc., admitted, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, that she had used a false social security number to transact business in the past.

The County is prepared to produce witnesses from the Department of the Auditor-Controller who will testify as to the admission made by Irma F. Reed. The County is also prepared to produce a written transcript of the interview which documents the admission made by Ms. Reed. The County is also prepared to play the relevant portion of the audio recording of Ms. Reed's interview.

3. Arrowhead Emancipation Program, Inc., violated numerous terms of its November 1, 2004, Group Home Foster Care Services contract with the County of Los Angeles including, but not necessarily limited to, the following: (i) failure to comply with applicable laws, (ii) failure to abide by the requirements of the Auditor-Controller's Handbook and applicable Office of Management and Budget circular and (iii) absence of required insurance.

The County is prepared to produce documentary and testimonial evidence demonstrating the terms of the relevant County contract, the applicable laws, the absence of required insurance, the failure to pay legally required taxes, a pattern of fraudulent property transactions, a pattern of self-dealing lease transactions, a pattern of questionable loans, a pattern of unallowable interest rate payments on those loans and other unsupportable expenditures.

With regard to the request that Charlene Williams be debarred, the County will produce documentary and testimonial evidence that Ms. Williams signed an impermissible and facially self-dealing lease agreement on behalf of Arrowhead Emancipation Program, Inc., Furthermore, her position of responsibility within Arrowhead Emancipation Program, Inc., meant that she must either have been a party to the group home's improprieties or else derelict in her duties.

4. Insofar as Arrowhead Emancipation Program, Inc., was in violation of the applicable law, in violation of the terms of its contract and yet submitted vouchers for group home services to the County of Los Angeles' Department of Children and Family Services seeking AFDC-FC funds in payment for those services, Arrowhead Emancipation Program, Inc., by and through its principals, submitted false claims to a public entity.

The County is prepared to produce documentary and testimonial evidence demonstrating the terms of the relevant County contract, the requirements of the applicable laws and the improper claims for payment submitted to the County by Arrowhead Emancipation Program, Inc., by and through its principals.

5. With regard to the request that Charlene Williams be debarred, the County will produce documentary and testimonial evidence that Ms. Williams, at a minimum, signed an impermissible and facially self-dealing lease agreement on behalf of Arrowhead Emancipation Program, Inc. Furthermore, her position of responsibility within Arrowhead Emancipation Program, Inc., required that she participate in the group home's improprieties or else acquiesce in those improprieties. If Ms. Williams intends to oppose debarment, the County asks that she be present and available to be questioned by the County's representatives.

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Irma F. Reed, Executive Director
Arrowhead Emancipation Program, Inc.
484 E. Sacramento Street
Altadena, CA 91001

2. Article Number

(Transfer from service label)

7006 2150 0000 4218 3199

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

Charlene Williams

☐ Agent

☐ Addressee

B. Received by (Printed Name)

Charlene Williams

C. Date of Delivery**D. Is delivery address different from item 1?**

☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

00514

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HOPE R. LEVY-BIEHL
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HOOPER, LUNDY & BOOKMAN, INC.

HEALTH CARE LAWYERS
1875 CENTURY PARK EAST, SUITE 1600
LOS ANGELES, CALIFORNIA 90067-2517
TELEPHONE (310) 551-8111
FACSIMILE (310) 551-8181
WEB SITE: WWW.HEALTH-LAW.COM

JORDAN B. KEVILLE
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TIEN NGUYEN

OFFICES ALSO LOCATED IN
SAN DIEGO
SAN FRANCISCO

March 14, 2008

WRITER'S DIRECT DIAL NUMBER:
(310) 551-8194

WRITER'S E-MAIL ADDRESS:
LKOLLAR@HEALTH-LAW.COM

VIA FACSIMILE (213/687-4745) & U.S. MAIL

Thomas Fagan, Senior Deputy Counsel
Social Services Division
Office of the County Counsel
648 Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, California 90012-2713


Re: Arrowhead Emancipation Program, Inc./Debarment Proceedings

Dear Mr. Fagan:

This letter will confirm our telephone conversation of today's date in which I informed you that Hooper, Lundy & Bookman, Inc. does not represent Arrowhead Emancipation Program, Inc. or its principals, Irma F. Reed and Charlene Williams, at this time. You informed me that you had given notice to Arrowhead Emancipation Program, Inc. and its principals of the debarment proceedings. I have forwarded your letter to them.

Should you have any questions, please do not hesitate to call upon me.

Sincerely,


Linda Randlett Kollar

LRK/gmr

cc: Ms. Irma F. Reed
Ms. Charlene Williams

1044757.1

00525



County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PATRICIA S. PLOEHN, LCSW
Director

BY CERTIFIED FIRST CLASS MAIL
AND BY FACSIMILE TO: (310) 551-8181

March 12, 2008

Linda Randlett Kollar
Hooper, Lundy & Bookman
1875 Century Park East – Suite 1600
Los Angeles, CA 90067-2799
Facsimile: (310) 551-8181

RE: DEBARMENT PROCEEDINGS

Dear Ms. Kollar:

The County of Los Angeles Department of Children and Family Services intends to recommend that Arrowhead Emancipation Program, Inc., and its principals, including but not necessarily limited to, Irma F. Reed and Charlene Williams, be debarred. The recommended debarment will be made pursuant to Los Angeles County Code chapter 2.202. The Los Angeles County Code is available online at the County website www.lacounty.info. Among other things, this notice specifies the basis for the proposed debarment recommendation, the proposed duration of the period of debarment and also includes a summary of evidence to support the recommendation. Those details are set forth in Attachment A, which is incorporated herein by reference.

The date, time and place of the debarment hearing are as follows:

DATE: Wednesday, April 23, 2008
TIME: 1:30 p.m.
PLACE: Kenneth Hahn Hall of Administration
500 West Temple Street, Room B28-E
Los Angeles, CA 90012

During the above-identified hearing, the Contractor Hearing Board will consider the department's recommendation that Arrowhead Emancipation Program, et al., be debarred. After the debarment hearing concludes, the Contractor Hearing Board will prepare a proposed decision. That decision will contain a recommendation to the County of Los Angeles Board of Supervisors as to whether or not Arrowhead Emancipation Program, Inc., and/or any of its principals, should be debarred and, if so,

Board of Supervisors

GLORIA MOLINA
First District

YVONNE B. BURKE
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

the appropriate length of time for debarment. The Board of Supervisors may, in its discretion, limit any further hearing to the presentation of evidence not previously presented. The Board of Supervisors has the right to modify, deny, or adopt the Contractor Hearing Board's proposed decision and recommendation. Any debarment finding shall become final upon approval of the Board of Supervisors.

At the Contractor Hearing Board hearing, a party to be debarred is entitled to appear and/or be represented by an attorney or other authorized representative. A party to be debarred is also entitled to present evidence against a finding of debarment, and during the hearing it or its representative may offer documentary evidence, present witnesses, and offer rebuttal evidence as authorized by the Los Angeles County Code. Alternatively, the department and the party to be debarred may agree to submit the matter to the Contractor Hearing Board on the basis of documentary evidence only.

Arrowhead Emancipation Program, Inc., et al., must confirm with the department that it and/or its representative intend to attend the April 23, 2008, Contractor Hearing Board hearing. A written confirmation of intent to attend the April 23, 2008, debarment hearing and oppose the debarment recommendation must be received by Diana Flaggs, of the Department of Children and Family Services, no later than 5:00 p.m. Pacific Daylight Saving Time, Friday, March 28, 2008. Failure to provide the department with written confirmation of intent to attend the hearing and oppose the debarment recommendation by the deadline set forth above may result in waiver of all rights to a hearing before the Contractor Hearing Board. Ms. Flaggs' mailing address is:

Diana Flaggs
Department of Children and Family Services
425 Shatto Place, Room 400
Los Angeles, CA 90020

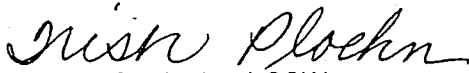
If Arrowhead Emancipation Program, Inc., et al., intend to oppose the debarment recommendation, the department will provide a list of prospective witnesses and copies of all documentary evidence at least five (5) days prior to the scheduled hearing. If Arrowhead Emancipation Program, Inc., et al., intend to present evidence against the proposed debarment, it must provide a list of all prospective witnesses and copies of any documentary evidence to the department at least five (5) days prior to the hearing. At the same time, the Contractor Hearing Board must also be provided with five (5) copies of each item so exchanged.

Those items must be received by Ms. Flaggs, of the Department of Children and Family Services, and Mr. Vincent Amerson, of the Chief Executive Office, no later than 5:00 p.m., April 18, 2008. Mr. Amerson's mailing address is:

Vincent Amerson
Chief Executive Office, Room 750
500 West Temple Street
Los Angeles, CA 90012

If you have any questions, please have your attorney contact Thomas Fagan, Senior Deputy County Counsel, at (213) 974-1919. If you do not have an attorney, you or your authorized representative may contact Mr. Fagan directly.

Very truly yours,



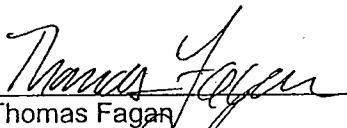
Patricia S. Ploehn, LCSW
Director

PSP

c: Vincent Amerson, Chief Executive Office, Contractor Hearing Board
Diana Flaggs, Department of Children and Family Services
Walter Chan, Department of Children and Family Services
Robert Campbell, Office of the Auditor-Controller
Thomas Fagan, Office of the County Counsel

Attachment

Approved as to form:


Thomas Fagan
Senior Deputy County Counsel
Office of the County Counsel

**ATTACHMENT A: Basis For Proposed Debarment Recommendation And
Summary Of Evidence To Support The Recommendation.**

The basis for the proposed debarment recommendation is that Arrowhead Emancipation Program, Inc., by and through its principals, (1) committed an act or omission which indicates a lack of business integrity or honesty; (2) committed an act or omission which negatively reflects on the contractor's quality, fitness, or capacity to perform a contract with the county, any other public entity, or a nonprofit corporation created by the county, or engaged in a pattern or practice which negatively reflects on same; (3) violated a term of a contract with the county or a nonprofit corporation created by the county, and (4) made or submitted a false claim against the county or any other public entity.

The Department of Children and Family Services will recommend debarment for the following periods of time:

Arrowhead Emancipation Program; Inc. – Permanent debarment

Irma F. Reed – Permanent debarment

Charlene Williams – Permanent debarment

A brief summary of the evidence to support the debarment recommendation is set forth below:

1. Arrowhead Emancipation Program, Inc., by and through Executive Director Irma F. Reed, created a W-2 Form which falsely listed a Mr. Clifford Johnson as an employee earning an annual salary, in 1996, of one hundred forty-seven thousand five hundred forty-one dollars and forty-five cents (\$147,541.45). In fact, Clifford Johnson was never an employee of Arrowhead Emancipation Program, Inc., nor did he draw a salary. Furthermore, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, Irma F. Reed admitted that Mr. Johnson was not an employee of Arrowhead Emancipation Program, Inc., he did not draw a salary from the organization, the W-2 Form was inaccurate and it was created in order to allow Mr. Johnson to use the form to qualify for a loan with which to purchase real property that he would not otherwise have qualified to purchase.

The County is prepared to produce a copy of the W-2 Form as well as witnesses from the Department of the Auditor-Controller who will testify as to the admissions made by Irma F. Reed. The County is also prepared to produce a written transcript of the interview which further documents the admissions made by Irma F. Reed. Additionally, the County is prepared to play the relevant portion of the audio recording of Ms. Reed's interview.

If Arrowhead Emancipation Program, Inc., or any of its principals, intend to oppose the recommended debarment, the Department of Children and Family Services asks that Ms. Irma F. Reed be present during the hearing and made available in order that she might be questioned by representatives of the County regarding her admissions, her actions and the actions of Arrowhead Emancipation Program, Inc., and its principals.

2. Irma F. Reed, the Executive Director of Arrowhead Emancipation Program, Inc., admitted, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, that she had used a false social security number to transact business in the past.

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The County is prepared to produce documentary and testimonial evidence demonstrating the terms of the relevant County contract, the applicable laws, the absence of required insurance, the failure to pay legally required taxes, a pattern of fraudulent property transactions, a pattern of self-dealing lease transactions, a pattern of questionable loans, a pattern of unallowable interest rate payments on those loans and other unsupportable expenditures.

With regard to the request that Charlene Williams be debarred, the County will produce documentary and testimonial evidence that Ms. Williams signed an impermissible and facially self-dealing lease agreement on behalf of Arrowhead Emancipation Program, Inc., Furthermore, her position of responsibility within Arrowhead Emancipation Program, Inc., meant that she must either have been a party to the group home's improprieties or else derelict in her duties.

4. Insofar as Arrowhead Emancipation Program, Inc., was in violation of the applicable law, in violation of the terms of its contract and yet submitted vouchers for group home services to the County of Los Angeles' Department of Children and Family Services seeking AFDC-FC funds in payment for those services, Arrowhead Emancipation Program, Inc., by and through its principals, submitted false claims to a public entity.

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1. Article Addressed to:

Linda Randlett Kollar
Hooper, Lundy & Bookman
1875 Century Park East, Suite 1600
Los Angeles, CA 90067-2799

2. Article Number
(Transfer from service label)

7006 2150 0000 4218 3182

PS Form 3811, February 2004

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102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY**A. Signature****X**☐ Agent☐ Addressee**B. Received by (Printed Name)****C. Date of Delivery**

3/14/08

D. Is delivery address different from item 1?☐ YesIf YES, enter delivery address below: ☐ No**3. Service Type**☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.**4. Restricted Delivery? (Extra Fee)**☐ Yes

00524



**County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PATRICIA S. PLOEHN, LCSW
Director

Board of Supervisors

GLORIA MOLINA
First District

YVONNE B. BURKE
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

March 31, 2008

Mrs. Charlene Williams, Program Director
Arrowhead Emancipation Program, Inc.
484 Sacramento Street
Altadena, CA 91001

Mrs. Charlene Williams, Program Director
Arrowhead Emancipation Program, Inc.
P.O. Box 93965
Pasadena, CA 91109

NOTIFICATION OF NON-RESPONSE TO DEBARMENT PROCEEDINGS

Dear Mrs. Reed:

In its notice of debarment, dated March 12, 2008, a copy of which I have attached for your reference, the County of Los Angeles Department of Children and Family Services (DCFS) notified you of its intent to recommend debarment of Arrowhead Emancipation Program (AEP) and its principals, including but not limited to, Irma F. Reed and Charlene Williams.

That notice required that AEP or its principals notify me in writing no later than 5:00 p.m. Pacific Daylight Time on Friday, March 28, 2008, if it, or its principals intended to appear and oppose the recommendation of debarment.

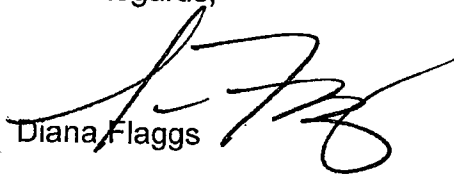
I am sending you this letter to memorialize the fact that I have received no indication, written or otherwise, that AEP, Mrs. Reed or Mrs. Williams intend to appear at the April 23rd debarment hearing and oppose the recommendation of debarment.

We construe your failure to respond as a waiver by AEP, Mrs. Reed and Mrs. Williams of their right to contest the debarment recommendation. The Department of Children and Family Services will thus proceed in your absence and place its uncontested recommendation before the Contractor Hearing Board.

Notification of Non Response to Debarment Proceedings
March 31, 2008
Page 2 of 2

If you have any questions regarding this letter your attorney, may contact Thomas Fagan, Senior Deputy County Counsel, at (213) 974-1919. If you do not have an attorney, you may contact Mr. Fagan directly.

Best Regards,


Diana Flaggs

c: Vincent Amerson, Chief Executive Officer, Contractor Hearing Board
Walter Chan, Department of Children and Family Services
Robert Campbell, Office of the Auditor-Controller
Thomas Fagan, Office of the County Counsel

Attachment I



County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PATRICIA S. PLOEHN, LCSW
Director

BY CERTIFIED FIRST CLASS MAIL
AND BY FACSIMILE TO: (626) 798-7004

March 12, 2008

Ms. Charlene Williams
Arrowhead Emancipation Program, Inc.
484 E. Sacramento Street
Altadena, CA 91001

Ms. Charlene Williams
Arrowhead Emancipation Program, Inc.
P.O. Box 93965
Pasadena, CA 91109

RE: DEBARMENT PROCEEDINGS

Dear Ms. Williams:

The County of Los Angeles Department of Children and Family Services intends to recommend that Arrowhead Emancipation Program, Inc., and its principals, including but not necessarily limited to Irma F. Reed and Charlene Williams, be debarred. The recommended debarment will be made pursuant to Los Angeles County Code chapter 2.202. The Los Angeles County Code is available online at the County website www.lacounty.info. Among other things, this notice specifies the basis for the proposed debarment recommendation, the proposed duration of the period of debarment and also includes a summary of evidence to support the recommendation. Those details are set forth in Attachment A, which is incorporated herein by reference.

The date, time and place of the debarment hearing are as follows:

DATE: Wednesday, April 23, 2008
TIME: 1:30 p.m.
PLACE: Kenneth Hahn Hall of Administration
500 West Temple Street, Room B28-E
Los Angeles, CA 90012

During the above-identified hearing, the Contractor Hearing Board will consider the department's recommendation that Arrowhead Emancipation Program, et al., be debarred. After the debarment hearing concludes, the Contractor Hearing Board will prepare a proposed decision. That decision will contain a recommendation to the County of Los Angeles Board of Supervisors as to whether or not Arrowhead Emancipation Program, Inc., and/or any of its principals, should be debarred and, if so,

Board of Supervisors

GLORIA MOLINA
First District

YVONNE B. BURKE
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

the appropriate length of time for debarment. The Board of Supervisors may, in its discretion, limit any further hearing to the presentation of evidence not previously presented. The Board of Supervisors has the right to modify, deny, or adopt the Contractor Hearing Board's proposed decision and recommendation. Any debarment finding shall become final upon approval of the Board of Supervisors.

At the Contractor Hearing Board hearing, a party to be debarred is entitled to appear and/or be represented by an attorney or other authorized representative. A party to be debarred is also entitled to present evidence against a finding of debarment, and during the hearing it or its representative may offer documentary evidence, present witnesses, and offer rebuttal evidence as authorized by the Los Angeles County Code. Alternatively, the department and the party to be debarred may agree to submit the matter to the Contractor Hearing Board on the basis of documentary evidence only.

Arrowhead Emancipation Program, Inc., et al., must confirm with the department that it and/or its representative intend to attend the April 23, 2008, Contractor Hearing Board hearing. A written confirmation of intent to attend the April 23, 2008, debarment hearing and oppose the debarment recommendation must be received by Diana Flaggs, of the Department of Children and Family Services, no later than 5:00 p.m. Pacific Daylight Saving Time, Friday, March 28, 2008. **Failure to provide the department with written confirmation of intent to attend the hearing and oppose the debarment recommendation by the deadline set forth above may result in waiver of all rights to a hearing before the Contractor Hearing Board.** Ms. Flaggs' mailing address is:

Diana Flaggs
Department of Children and Family Services
425 Shatto Place, Room 400
Los Angeles, CA 90020

If Arrowhead Emancipation Program, Inc., et al., intend to oppose the debarment recommendation, the department will provide a list of prospective witnesses and copies of all documentary evidence at least five (5) days prior to the scheduled hearing. If Arrowhead Emancipation Program, Inc., et al., intend to present evidence against the proposed debarment, it must provide a list of all prospective witnesses and copies of any documentary evidence to the department at least five (5) days prior to the hearing. At the same time, the Contractor Hearing Board must also be provided with five (5) copies of each item so exchanged.

Those items must be received by Ms. Flaggs, of the Department of Children and Family Services, and Mr. Vincent Amerson, of the Chief Executive Office, no later than 5:00 p.m., April 18, 2008. Mr. Amerson's mailing address is:

Vincent Amerson
Chief Executive Office, Room 750
500 West Temple Street
Los Angeles, CA 90012

If you have any questions, please have your attorney contact Thomas Fagan, Senior Deputy County Counsel, at (213) 974-1919. If you do not have an attorney, you or your authorized representative may contact Mr. Fagan directly.

Very truly yours,



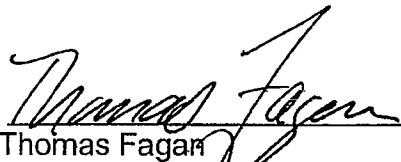
Patricia S. Ploehn, LCSW
Director

PSP

c: Vincent Amerson, Chief Executive Office, Contractor Hearing Board
Diana Flaggs, Department of Children and Family Services
Walter Chan, Department of Children and Family Services
Robert Campbell, Office of the Auditor-Controller
Thomas Fagan, Office of the County Counsel

Attachment

Approved as to form:



Thomas Fagan
Senior Deputy County Counsel
Office of the County Counsel

**ATTACHMENT A: Basis For Proposed Debarment Recommendation And
Summary Of Evidence To Support The Recommendation.**

The basis for the proposed debarment recommendation is that Arrowhead Emancipation Program, Inc., by and through its principals, (1) committed an act or omission which indicates a lack of business integrity or honesty; (2) committed an act or omission which negatively reflects on the contractor's quality, fitness, or capacity to perform a contract with the county, any other public entity, or a nonprofit corporation created by the county, or engaged in a pattern or practice which negatively reflects on same; (3) violated a term of a contract with the county or a nonprofit corporation created by the county, and (4) made or submitted a false claim against the county or any other public entity.

The Department of Children and Family Services will recommend debarment for the following periods of time:

Arrowhead Emancipation Program, Inc. – Permanent debarment

Irma F. Reed – Permanent debarment

Charlene Williams – Permanent debarment

A brief summary of the evidence to support the debarment recommendation is set forth below:

1. Arrowhead Emancipation Program, Inc., by and through Executive Director Irma F. Reed, created a W-2 Form which falsely listed a Mr. Clifford Johnson as an employee earning an annual salary, in 1996, of one hundred forty-seven thousand five hundred forty-one dollars and forty-five cents (\$147,541.45). In fact, Clifford Johnson was never an employee of Arrowhead Emancipation Program, Inc., nor did he draw a salary. Furthermore, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, Irma F. Reed admitted that Mr. Johnson was not an employee of Arrowhead Emancipation Program, Inc., he did not draw a salary from the organization, the W-2 Form was inaccurate and it was created in order to allow Mr. Johnson to use the form to qualify for a loan with which to purchase real property that he would not otherwise have qualified to purchase.

The County is prepared to produce a copy of the W-2 Form as well as witnesses from the Department of the Auditor-Controller who will testify as to the admissions made by Irma F. Reed. The County is also prepared to produce a written transcript of the interview which further documents the admissions made by Irma F. Reed. Additionally, the County is prepared to play the relevant portion of the audio recording of Ms. Reed's interview.

If Arrowhead Emancipation Program, Inc., or any of its principals, intend to oppose the recommended debarment, the Department of Children and Family Services asks that Ms. Irma F. Reed be present during the hearing and made available in order that she might be questioned by representatives of the County regarding her admissions, her actions, and the actions of Arrowhead Emancipation Program, Inc., and its principals.

2. Irma F. Reed, the Executive Director of Arrowhead Emancipation Program, Inc., admitted, in an interview with representatives of the County of Los Angeles Department of the Auditor-Controller, that she had used a false social security number to transact business in the past.

The County is prepared to produce witnesses from the Department of the Auditor-Controller who will testify as to the admission made by Irma F. Reed. The County is also prepared to produce a written transcript of the interview which documents the admission made by Ms. Reed. The County is also prepared to play the relevant portion of the audio recording of Ms. Reed's interview.

3. Arrowhead Emancipation Program, Inc., violated numerous terms of its November 1, 2004, Group Home Foster Care Services contract with the County of Los Angeles including, but not necessarily limited to, the following: (i) failure to comply with applicable laws, (ii) failure to abide by the requirements of the Auditor-Controller's Handbook and applicable Office of Management and Budget circular and (iii) absence of required insurance.

The County is prepared to produce documentary and testimonial evidence demonstrating the terms of the relevant County contract, the applicable laws, the absence of required insurance, the failure to pay legally required taxes, a pattern of fraudulent property transactions, a pattern of self-dealing lease transactions, a pattern of questionable loans, a pattern of unallowable interest rate payments on those loans and other unsupportable expenditures.

With regard to the request that Charlene Williams be debarred, the County will produce documentary and testimonial evidence that Ms. Williams signed an impermissible and facially self-dealing lease agreement on behalf of Arrowhead Emancipation Program, Inc., Furthermore, her position of responsibility within Arrowhead Emancipation Program, Inc., meant that she must either have been a party to the group home's improprieties or else derelict in her duties.

4. Insofar as Arrowhead Emancipation Program, Inc., was in violation of the applicable law, in violation of the terms of its contract and yet submitted vouchers for group home services to the County of Los Angeles' Department of Children and Family Services seeking AFDC-FC funds in payment for those services, Arrowhead Emancipation Program, Inc., by and through its principals, submitted false claims to a public entity.

The County is prepared to produce documentary and testimonial evidence demonstrating the terms of the relevant County contract, the requirements of the applicable laws and the improper claims for payment submitted to the County by Arrowhead Emancipation Program, Inc., by and through its principals.

5. With regard to the request that Charlene Williams be debarred, the County will produce documentary and testimonial evidence that Ms. Williams, at a minimum, signed an impermissible and facially self-dealing lease agreement on behalf of Arrowhead Emancipation Program, Inc. Furthermore, her position of responsibility within Arrowhead Emancipation Program, Inc., required that she participate in the group home's improprieties or else acquiesce in those improprieties. If Ms. Williams intends to oppose debarment, the County asks that she be present and available to be questioned by the County's representatives.

EXHIBITS ENTERED INTO THE RECORD OF THE DEBARMENT HEARING OF ARROWHEAD
EMANCIPATION PROGRAM, INC., AND ITS PRINCIPALS, IRMA F. REED AND CHARLENE WILLIAMS

County of Los Angeles, Department of Children and Family Services:

Correspondence and supporting documentation prepared by Tom Fagan, Senior Deputy County Counsel, consisting of:

- ❖ Witness List
- ❖ Exhibit Book Volume 1 (Exhibits 1-8)
- ❖ Exhibit Book Volume 2 (Exhibits 9-18)
- ❖ Exhibit Book Volume 3 (Exhibits 19-46)
- ❖ Statement of Position

Arrowhead Emancipation Program, Inc.

No exhibits, correspondence or supporting documentation were presented by Arrowhead Emancipation Program, Inc.

**PARTICIPANTS IN THE CONTRACTOR HEARING BOARD DEBARMENT PROCEEDINGS FOR
ARROWHEAD EMANCIPATION PROGRAM, INC.,
APRIL 23, 2008
1:30 P.M.
KENNETH HAHN HALL OF ADMINISTRATION
ASSESSMENT APPEALS BOARD ROOM B-28E
500 WEST TEMPLE STREET
LOS ANGELES, CA 90012**

CONTRACTOR HEARING BOARD

MARTIN ZIMMERMAN, CHAIR, ASSISTANT CHIEF EXECUTIVE OFFICER, CHIEF EXECUTIVE OFFICE
OZIE L. SMITH, SENIOR DEPUTY COMPLIANCE OFFICER, OFFICE OF AFFIRMATIVE ACTION
COMPLIANCE
MASSOOD EFTEKHARI, ASSISTANT DEPUTY DIRECTOR, DEPARTMENT OF PUBLIC WORKS
DAVID YAMASHITA, GENERAL MANAGER, INTERNAL SERVICES DEPARTMENT
VINCENT AMERSON, ANALYST, CHIEF EXECUTIVE OFFICE, STAFF TO THE CHB

ARROWHEAD EMANCIPATION PROGRAM, INC.

NO PARTICIPANTS

OFFICE OF THE COUNTY COUNSEL

BEHNAZ TASHAKORIAN, LEGAL ADVISOR TO THE CHB, DEPUTY COUNTY COUNSEL, CONTRACTS
DIVISION
NANCY TAKADE, LEGAL ADVISOR TO THE CHB, PRINCIPAL DEPUTY COUNTY COUNSEL,
GOVERNMENT SERVICES DIVISION
TOM FAGAN, LEGAL ADVISOR TO AND REPRESENTATIVE OF DCFS, SENIOR DEPUTY COUNTY
COUNSEL, SOCIAL SERVICES DIVISION.

WITNESSES

ROBERT CAMPBELL, SUPERVISING INVESTIGATOR, OFFICE OF COUNTY INVESTIGATIONS, AUDITOR-
CONTROLLER
DIANA FLAGGS, CONTRACT ANALYST, DEPARTMENT OF CHILDREN AND FAMILY SERVICES

ALSO PRESENT

WALTER PUE-KWONG CHAN, ASSISTANT DIVISION CHIEF, CONTRACTS ADMINISTRATION DIVISION,
DEPARTMENT OF CHILDREN AND FAMILY SERVICES